

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES EQUAL EMPLOYMENT)	CASE NO. 17-cv-01084-AJT-JFA
OPPORTUNITY COMMISSION,)	
Plaintiff,)	
)	
vs.)	
)	
CAMBER CORPORATION,)	
Defendant.)	
_____)	

**UNOPPOSED MOTION TO PERMIT LOCAL COUNSEL TO ATTEND
HEARING BY TELEPHONE AND WAIVER OF HEARING**

Pursuant to the Local Rules, EEOC hereby submits this unopposed motion to permit EEOC's local counsel to attend hearing by telephone, and in support thereof state:

1. Scheduled for hearing on January 12, 2018 at 10:00 a.m. is Defendant's Motion to Partially Dismiss Plaintiff's Complaint (ECF 7). The undersigned EEOC Senior Trial Attorney, Jeffrey A. Stern, who has been admitted in this matter *pro hac vice*, is responsible for the content of the Commission's brief filed in opposition to Defendant's motion, and is knowledgeable as to all issues bearing on the motion and this litigation. Mr. Stern is the Commission's lead counsel in this matter.

2. The Commission acknowledges that its local counsel, David Staudt, is required to appear in person at all hearings, and Mr. Staudt is prepared to attend to hearing in person should the Court decline to grant this motion. However, given that EEOC's lead counsel, Jeffrey Stern, will handle the substance of the upcoming hearing, the Commission seeks the Court's permission to allow its local counsel to attend by telephone, thus avoiding the need for two Commission trial attorneys to travel to the Court and appear in person.

3. The undersigned acknowledge that the Court will call this motion up for hearing along with other matters, and that it may be unworkable for the Court to permit EEOC's local counsel to attend by telephone. In that case, EEOC seeks in the alternative permission to excuse its local counsel from his required attendance at the hearing. Of course, if the Court prefers that EEOC's local counsel attend the hearing in person the Commission will fully comply and, absent an order granting this motion, the Commission will have both its lead and local counsel attend.

4. L.R. 83.1(F) obliges an admitted attorney be personally present at all hearings, absent leave of Court. EEOC seeks leave of Court to permit local counsel to participate by telephone or, in the alternative, to excuse him, pursuant to Rule 83.1(F).

5. EEOC has consulted with Defendant's counsel, who states that he does not oppose this motion and the relief sought.

6. EEOC seeks the above referenced relief in good faith, and not for any improper purpose.

7. Pursuant to the Local Rules governing matters pending in the Eastern District of Virginia, and in Alexandria, EEOC confirms that the parties waive hearing on this motion. Moreover, pursuant to the Rules a proposed Order is attached to this unopposed motion for entry.

Respectfully submitted,

/s/

Senior Trial Attorney, admitted *pro hac vice*
Jeffrey A. Stern (Ohio Bar No. 0020107)
jeffrey.stern@eeoc.gov

U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
Cleveland Field Office
AJC Federal Bldg.
1240 East Ninth St., Ste. 3001
Cleveland, OH 44199

(216) 522-7458
(216) 522-7430 (fax)

Lead Counsel for EEOC

By:

/s/

David Staudt
Va. Bar ID # 47442
U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
Baltimore Field Office
GH Fallon Federal Building
31 Hopkins Plaza, Suite 1432
Baltimore, MD 21201
Phone: 410-209-2249
Fax: 410-962-4270
david.staudt@eeoc.gov

Local Counsel for EEOC

and

DEFENDANT CAMBER CORPORATION

By:

/s/by email consent 1/8/2018

Robert L. Ortvals, Jr.
7733 Forsyth Blvd., Suite 1325
St. Louis, MO 63105
Telephone: 314-925-7270
Fax: 314-925-7278
rortvals@constangy.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of January 2018, I filed the foregoing UNOPPOSED MOTION TO PERMIT LOCAL COUNSEL TO ATTEND HEARING BY TELEPHONE AND WAIVER OF HEARING with Proposed Order using the CM/ECF system, which will send a notification of such filing (NEF) to all ECF counsel of record in this matter.

s/David Staudt

David Staudt

Va. Bar ID # 47442

U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

Baltimore Field Office

GH Fallon Federal Building

31 Hopkins Plaza, Suite 1432

Baltimore, MD 21201

Phone: 410-209-2249

Fax: 410-962-4270

david.staudt@eeoc.gov